

March 26, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)**  
**Docket No. 2021-89-E (Duke Energy Carolinas, LLC)**  
**Docket No. 2021-90-E (Duke Energy Progress, LLC)**

Dear Ms. Boyd:

On March 10, 2021, the Commission issued Order No. 2021-166 setting forth the procedural schedule in the above-referenced matters, which requires Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP," and together with DEC, the "Companies") to file an application on April 19, 2021. The Companies hereby respectfully request the Public Service Commission of South Carolina (the "Commission") hold these procedural deadlines in abeyance, for the reasons explained below, and permit the parties to submit a proposed procedural schedule to the Commission no later than April 30, 2021. I have consulted with counsel for the Office of Regulatory Staff ("ORS"), Carolinas Clean Energy Business Association ("CCEBA"), and Southern Alliance for Clean Energy/South Carolina Coastal Conservation League ("SACE/CCL"), and these interested parties (the Companies anticipate CCEBA and SACE/CCL will be parties to these dockets) do not oppose this request.

In Order No. 2019-881(A) issued January 2, 2020, in Docket Nos. 2019-185-E/2019-186-E (the Companies' 2019 avoided cost proceedings) the Commission approved a partial Settlement Agreement ("Agreement") between the Companies, South Carolina Solar Business Alliance,<sup>1</sup> Johnson Development Associates, Inc., and SACE/CCL. As part of that Agreement, the Companies agreed to submit the methodology and inputs used to calculate their solar integration services charge ("SISC") to an independent technical review and to include the results of that review and any revisions in their initial filing in the next avoided cost proceeding.

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<sup>1</sup> On March 10, 2021, the Commission issued Order No. 2021-167 and granted South Carolina Solar Business Alliance's Motion to substitute CCEBA as the party of record in the 2019 avoided cost dockets.

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The Companies have initiated this SISC independent technical review process required by the Agreement, and such review is expected to take approximately four months to complete and will culminate in a report to be issued in July 2021. The Companies formed the technical review committee, in consultation with ORS and the North Carolina Public Staff, between December 2020 and February 2021. The Companies have retained the Brattle Group to act as Principal Consultant with experts from three National Labs comprising the technical review committee. Initial meetings of the SISC technical review committee have recently been held in March 2021. The Companies also held a stakeholder information meeting on the SISC technical review process on March 19, 2021, with ORS, CCEBA, and SACE/CCL representatives in attendance. The Companies have also committed to host another informational stakeholder meeting after the technical review committee completes its work and issues its report.

Accordingly, in light of the significant ongoing work to complete the SISC independent technical review process and consistent with the Agreement and the Commission's directives in Order No. 2019-881(A) approving the Agreement, the Companies submit that this independent technical review of the SISC is required to be completed before the Companies can prepare the application for the 2021 avoided cost proceedings.

Based on the foregoing, the Companies request the Commission hold the procedural deadlines in these proceedings in abeyance and allow the interested parties to these dockets to propose a procedural schedule no later than April 30, 2021.

Sincerely,



Rebecca J. Dulin

C: Parties of Record (via email)  
Andrew Bateman, ORS (via email)  
Alexander Knowles, ORS (via email)  
Carri Grube Lybarker, SCDCA (via email)  
Ryan Hall, SCDCA (via email)  
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